

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S MOTION TO  
COMPEL AND MOTION FOR EXPEDITED  
BRIEFING**

Defendant Google LLC (“Google”) hereby moves to compel Plaintiff Singular Computing LLC (“Singular”) to (1) provide substantive responses to Google’s Interrogatory Nos. 16, 22, 23, 24, and 26; (2) to respond to Request for Admission (“RFA”) No. 2; and (3) to produce documents responsive to Request for Production (“RFP”) Nos. 17 and 82. Google submits the accompanying Memorandum of Law in Support of its Motion to Compel. Additionally, in light of the impending deadline for close of fact discovery, Google respectfully requests that the Court enter an Order for an expedited briefing scheduling, with Singular’s response due to be filed by Thursday, July 22, 2021. Singular does not oppose Google’s request for expedited briefing.

As set forth in Google’s Memorandum of Law, the discovery Google seeks from Singular is relevant to the issues in this litigation, and Singular has offered no justification for refusing to respond. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Google respectfully requests that this Honorable Court:

1. Order expedited briefing, such that Singular’s response is due on Thursday, July 22, 2021;
2. Compel Singular to provide substantive responses to Google’s Interrogatory Nos. 16, 22, 23, 24, and 26;
3. Compel Singular to respond to RFA No. 2; and
4. Compel Singular to produce documents responsive to RFP Nos. 17 and 82.

Respectfully submitted,

Dated: July 15, 2021

By: /s/ Nathan R. Speed

Gregory F. Corbett (BBO #646394)  
gregory.corbett@wolfgreenfield.com  
Nathan R. Speed (BBO # 670249)  
nathan.speed@wolfgreenfield.com  
Elizabeth A. DiMarco (BBO #681921)  
elizabeth.dimarco@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
Telephone: (617) 646-8000  
Fax: (617) 646-8646

Asim Bhansali (*pro hac vice*)  
abhansali@kblfirm.com  
KWUN BHANSALI LAZARUS LLP  
555 Montgomery Street, Suite 750  
San Francisco, CA 94111

Matthias Kamber (*pro hac vice*)  
mkamber@keker.com  
KEKER, VAN NEST & PETERS LLP  
633 Battery Street  
San Francisco, CA 94111-1809

*Attorneys for Defendant Google LLC*

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Nathan R. Speed, counsel for Defendant, hereby certifies that Defendant's counsel conferred with Plaintiffs' counsel in a good-faith attempt to resolve or narrow the issue raised by this motion. I further certify that Plaintiffs' counsel does not oppose Google's request for expedited briefing.

/s/ Nathan R. Speed  
Nathan R. Speed

**LOCAL RULE 37.1(b) CERTIFICATION**

I, Nathan R. Speed, counsel for Defendant, hereby certify that the provisions of Rule 37.1 have been complied with.

/s/ Nathan R. Speed  
Nathan R. Speed

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the foregoing pleading was served upon the attorneys of record for all parties by electronically filing the foregoing pleading with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to registered attorneys of record.

Dated: July 15, 2021

/s/ Nathan R. Speed

Nathan R. Speed